

for U.S.D.C.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

CHRISTOPHER ODOM

[Enter the full name of the plaintiff in this action]
CRC004639 H962707A

v.

STATE OF SOUTH CAROLINA
et al.

#95DR1005342 et al.

claim DATE 10-29-10 (Judge

GIANFINKEE) sealed on 10-29-10

[Enter above the full name of defendant(s) in this action]
for U.S.D.C. of South Carolina

I. PREVIOUS LAWSUITS

N/A

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes _____ No _____

B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: _____

Defendant(s): _____

2. Court: N/A
(If federal court, name the district; if state court, name the county)

3. Docket Number: N/A

4. Name(s) of Judge(s) to whom case was assigned: N/A

5. Disposition: N/A
(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

To Be Assigned by U.S.D.C.
Clerk of Court.Civil Action No. # _____
(to be assigned by Clerk)

COMPLAINT

State Prisoner

SEE ATTACHMENT

A thru K

I thru XI

Amendment to claim
10-29-10 / #95DR1005342Sept. 23, 2013
Pg. 1 of 18RECEIVED CLERK'S OFFICE
2013 SEP 25 A 10:09
FEDERAL COURT

For U.S.D.C.

FOR U.S.D.C.
OF South CAROLINA

RECEIVED CLERK'S OFFICE

2013 SEP 18 A 9:54

DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA, SOUTH CAROLINA

CHRISTOPHER ODOM

Plaintiff

v.

STATE OF South CAROLINA et. AL.,
Case #2012-CP-10-6646
Case #95DR1005342,
et. AL

Enclosed see

Admendment of
claim originally filed
on 10-29-10.

CLAIM ORIGINALLY FILED ON 10-29-10

AT FAMILY COURT 100 BROAD ST. CHAS. S.C. 29401
AND given to prison authorities/Judge GARFINKEL
AT 100 BROAD STREET CHAS. S.C. whom (Judge
GARFINKEL) request that claim/civil rights lawsuit
be sealed. PLEASE ORDER RECORDS/CLAIM to be unseal
AND Amended too enclosed complaint.

Also Plaintiff/Petitioner REITERATE REQUEST
ON 10-29-10 complaint that this petition move in
FORMA PAUPERIS.

Sept. 23, 2013
2013/10/16

Sept. 11, 2013
Plaintiff/Petitioner

For U.S.D.C.
 • NOTE: Pages also in Roman Numerals I thru ~~XI~~
 Sept. 11th, 2013

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

Page A then ~~X~~
 I then ~~XI~~

[See ~~Pages~~
 A then ~~E~~]

CHRISTOPHER ODOM (Patient I.D. #ERL004639-H 9624707A)
 PLAINTIFF

V.
 STATE OF SOUTH CAROLINA, STATE OF SOUTH CAROLINA TAXPAYERS
 THE PEOPLE OF CHARLESTON TAXPAYERS
 CHARLESTON COUNTY PUBLIC DEFENDERS OFFICE
 SHERIFF AL CANNON Employees
 SHERIFF AL CANNON Detention Center
 SHERIFF AL CANNON Detention Center
 City of Charleston taxpayers
 City of Charleston taxpayers/MAYOR Riley
 City of N. Charleston taxpayers
 City of N. Charleston taxpayers/MAYOR K. Summerville
 City of Charleston Police Department
 City of N. Charleston Police Department
 Family Court case #183442/#95NR1005342
 Department of Social Services of S.C.
 S.O.G. of SHERIFF AL CANNON Detention Center
 Governor Nikki Haley
 SOUTH CAROLINA Department of Mental Health
 G. Werber Bryan Psychological Hospital of S.C.
 DR. FERLANTO, (M.U.S.C.) Medical University of S.C.
 DR. GRISWOLD, (M.U.S.C.) Medical University of S.C.
 CRAFTS FARROW STATE HOSPITAL
 SOUTH CAROLINA Department of Mental Health Employees STAFF
 (3) security and health care providers
 D.H.E.C. THE MEDICAL UNIVERSITY OF SOUTH CAROLINA, *M.U.S.C.*
 CHAMPAS, JUST CARE,
 G.E.O.
 CHARLESTON county solicitors Office
 U.S.D.C. of S.C. / U.S.C.A. For the Fourth Circuit of Richmond, Virginia/
 UNITED STATES SUPREME COURT CASE Number 3:11-cv-2713, 3:11-w-
 901, 3:11-cv-903, 3:11-w-605, 3:11-cv-606, 3:11-cv-1483, 11-063, 11-064,
 11-065, 3:11-w-1090, 3:11-w-1081, 3:11-w-1082, 3:11-w-1083,
 3:11-w-1093, 3:11-w-365, Warrant #K380534, Warrant #K295040,
 Warrant #K353668, Warrant #30669ET, Warrant #30669ET, Warrant
 #2010-CP-10-DD(40) CASE of South Carolina Court of Appeals
 2012-209410, #K353669, 2012-CP-10-6446, 3:11-cv-1053
 ALL THE ABOVE NAME & CAPTIONED Defendants personal injury, grossly
 negligence Insurance Policy holders, social security claim #MT3101,
 Dr. Russel Keith
 Dr. J. Bervin
 The Defendants Liability Insurance policy holder

DEFENDANT(S)

Sept. 23rd 2013
 103 of 18

RECEIVED CLERK'S OFFICE

2013 SEP 18 A 9:54

DISTRICT COURT
 COUNTY OF CHARLESTON

For U.S.P.C.
Sept. 17th 2013

Complaint

PAGE B
II

The CAPTIONED DEFENDANTS VIOLATED PLAINTIFF PERSONAL PROPERTY, PLAINTIFF PHYSICAL BEING CAUSING PLAINTIFF EMOTIONAL DISTRESS, INJURIES AND MALICIOUS MISCHIEF.

ON OCTOBER 12, 2010 THRU NOVEMBER 29th 2011 ALL DEFENDANTS OF CAPTION WILLFULLY, RECKLESSLY, FRAUDULENTLY WITH MALICE AND GROSSLY NEGLIGENCE TO INCLUDE HOWEVER NOT LIMITED TO CRUEL AND UNUSUAL PUNISHMENT BY PLACING PLAINTIFF IN SOLITARY CONFINEMENT AT S.A.C.D.C. IN UNIT 1A & UNIT 1B, IN C.C.O.H. hospital (LOCATED WITHIN S.A.C.D.C.), C.C.O.H. hospital INCUBATOR, G. WERBER BRYAN PSY hospital, CRAFTS FARROW STATE hospital, JUST CARE AND THE SOUTH CAROLINA DEPARTMENT OF MENTAL HEALTH, IN ATTEMPT TO DISCREDIT PLAINTIFF CIVIL ACTION CLAIMS FILED IN THE U.S.A.C. OF SOUTH CAROLINA CIVIL ACTION CLAIMS 4th CIRCUIT RICHMOND VIRGINIA, AND THE UNITED STATES SUPREME COURT OF WASHINGTON D.C. THEREFORE, AS A RESULT PLAINTIFF WAS RAPE BY THE CAPTIONED DEFENDANTS, INJECTED WITH DRUGS AND WAS FORCE TO INDUCE "THE DRUG HALDOL" (3) TIMES A DAY FOR SIXTY (60) DAYS, OTHERWISE INJURED PLAINTIFF PREVENTING PLAINTIFF FROM TRANSACTING PLAINTIFF BUSINESS. PLAINTIFF SUFFERED GREAT PAIN OF BODY AND MIND AND INCURRED EXPENSES FOR MEDICAL ATTENTION AND HOSPITALIZATION IN THE SUM THOUSANDS OF DOLLARS WHEREFORE, PLAINTIFF DEMANDS JUDGMENT AGAINST THE CAPTIONED DEFENDANT OR DEFENDANTS (STATE OF SOUTH CAROLINA TAXPAYER AND STATE OF SOUTH CAROLINA ELECTED OFFICIALS/NICKI HALLEY WHOM OF AUTHORITY/RESPONSIBLE IN THE SUM OF \$16 MILLION DOLLARS, INTEREST AND COST. (PLAINTIFF SEEKS DAMAGES ALSO FOR FEBRUARY 14 2009 CAR WINDOW DAMAGES COST \$300.00 BAIL BOND \$3,000.00 DEFENDANTS LIABILITY INSURER.

PLAINTIFF REITERATES AND DEMAND REQUEST THAT A RESTRAINT ORDER BE PLACE ON THE DEFENDANTS, DEFENDANTS AFFILIATION AND DEFENDANT ENTITIES;
 ① STATE OF SOUTH CAROLINA ② CHARLESTON COUNTY PUBLIC DEFENDERS OFFICE;
 ③ SHERIFF AL CANNON ④ SHERIFF AL CANNON EMPLOYEES/S.A.C.D.C. EMPLOYEES
 ⑤ FAMILY COURT D.S.S. #183442/#95DR1005342 ⑥ C.C.O.H. ⑦ S.O.G. OF S.A.C.D.C. ⑧ S.O.G. EMPLOYEES OF S.A.C.D.C. ⑨ GOVERNOR NICKI HALLEY
 ⑩ SOUTH CAROLINA DEPARTMENT OF MENTAL HEALTH STAFF, EMPLOYEES
 SECURITY AND HEALTH CARE PROVIDERS, JUST CARE, G.E.D. CHAMPAS
 G. WERBER PSY HOSPITAL, CRAFTS FARROW HOSPITAL, SOCIAL SECURITY
 CLAIM #M73101 (DR. RUSSEL D. KITCH, DR. JENNIFER BENNICIE) D.H.E.C.
 ⑪ CHARLESTON COUNTY SOLICITORS OFFICE ⑫ CHARLESTON COUNTY PUBLIC DEFENDERS OFFICE ALSO ALL DEFENDANTS OF U.S.D.C./U.S.C.A. / U.S.S.C.
 CASE(S); 3:11-cv-2713, 3:11-cv-901, 3:11-cv-903, 3:11-cv-605, 3:11-cv-606, 3:11-cv-1486, 3:11-cv-365
 3:11-cv-1080, 3:11-cv-1081, 3:11-cv-1082, 3:11-cv-1083, 11-063, 11-064, 11-065, 3:11-cv-1053
 NEGLIGENCE POLICY HOLDERS) TO INCLUDE HOWEVER NOT LIMITED TO WARRANT # K380534, WARRANT # 295040 WARRANT # 30665ET WARRANT # 30669ET, CASE # 2012-209410
 CASE # M73101, WARRANT # K353669, BY REASON OF DEFENDANTS MALPRACTICE

(CONTINUED ON NEXT PAGE)

Sept. 23 2013
P. 4 OF 10

For U.S.D.C. Sept. 11, 2013

PAGE 5

grossly negligence, CRUEL and unusual punishment, torture by placing Plaintiff in solitary confinement, hospital incubators and STATE Hospitals/STATE Hospitalization, from October 12, 2010 thru November 29th 2011 to include however not limited too S.O.G. employees, S.A.C.D.C. employees, S.C.D.M.H. employees (also the defendants placing Plaintiff in RESTRAINT CHAIR over (4) four times denying Plaintiff Access to the TTY Phone PLACING Plaintiff in RESTRAINT CHAIR on January 7th, 2011 not releasing Plaintiff from RESTRAINT CHAIR until January 8th, 2011 denying Plaintiff Access to drinking water, Restroom use, etcetera. Also during this time frame the defendants [O.F.C. FOSE] Kicks Plaintiff AND [O.F.C. SURFACE] sprays unknown chemicals in face of Plaintiff AND Continued Assault ON Plaintiff while Plaintiff is seated RESTRAINED in RESTRAINT chair in UNIT 1A AT S.A.C.D.C. ON January 7th, 2011 thru January 8th, 2011. THE captioned throughout the year 2010 thru November 2011 placed Plaintiff in "false light" placing Plaintiff in RESTRAINT in RESTRAINT chair and solitary confinement allowing civilian tourist, civilian children, civilian boys, civilian girls, civilian men, civilian women to view Plaintiff in A "false light" And defamation with malice and mockery, INVADING Plaintiff Privacy Rights to include however not limited too Plaintiff civil rights was violated by the hands OF ALL captioned defendants with malice, throughout this Complaint/Civil Rights Action. Also S.O.G. [Officer Hood] shooting Plaintiff with TAZER gun on January 10th, 2011 And C.C.O.H. medical staff acting fraudulently as Plaintiff medical facilitator (by co-conspiring with S.O.G. employees/ S.A.C.D.C. Employees C.C.O.H. Nurses P.H.C.) without Plaintiff (notice of contract) written consent/signature. Charleston County Public Defenders Office/ Charleston County Solicitors Office And THE STATE OF South Carolina co-conspiring to discredit Plaintiff And Plaintiff civil action claim(s) (also see sealed family court documents case #95DR1005342 ON November 29th, 2010 by Judge Paul Garfinkel And Plaintiff Request that sealed documents be amended to this civil action). Prior to these INJURIES Plaintiff was a strong ABLE BODIED man CAPABLE OF EARNINGS By these INJURIES Plaintiff HAS BEEN made INCAPABLE OF Any gainful Activity HAS suffered great physical AND mental pain AND has incurred expense of medicine, medical Attendance and hospitalization. NOTE: For the record the Plaintiff did not allow/consent to representation by Charleston County Public Defenders Office until December 2, 2011 AND only reason (reasons) the Plaintiff consented to Charleston County Public Defenders Office representation ON December 2, 2011 is to stop the torture, cruel and unusual punishment, grossly negligence with malice and malpractice [Dr. Griswold, Dr. Ferlanto, C.C.O.H. medical] to include however not limited torture by the hands of City of Charleston Police Department City of North Charleston Police Department City of Charleston Mayor Riley, City of North Charleston Mayor Summey, Sheriff Al Cannon, ALL captioned defendants of this complaint civil action, personal injuries torture towards Plaintiff. THE Defendants breach the contract OF THE UNITED STATES CONSTITUTION to include however not limited too

(CONTINUED ON NEXT PAGE)

Sept 23, 2013 5 of 10


denying Plaintiff "Due Process of Law". The Defendants housed Plaintiff in dilapidated jail cells of S.A.C.D.C. Unit 1A that exposed Plaintiff to paint peelings (Plaintiff mail evidence of Paint Peelings (Plaintiff mail evidence of Paint Peelings to U.S.D.C. Justices of South Carolina). These jail cells of Unit 1A S.A.C.D.C. are infested with bacteria feces on walls and ceilings. The defendants also exposed Plaintiff to those fumes, and fresh paint fumes while the defendant attempt to cover feces/bacteria floors and walls with fresh paint in Unit 1A to Allure Government Inspector/Accreditation of S.A.C.D.C. Condition of Jail Score, leaving condition of housed detainees/Plaintiff. These solitary confinement condition to include however not limited fumes, bacteria walls, ceiling and floors of Unit 1A cause Plaintiff medical problems (See medical Reports). Throughout solitary confinement the Defendants of S.A.C.D.C. employees used "Food As Weapon", (Denying Plaintiff meals) causing Plaintiff great weight lost. Note: Inmates/Detainees/Plaintiff to eat meals in dilapidated cells in Unit 1A therefore it is Arbitrarily Impossible to Unit 1A/Unit 1B detainees/Plaintiff are receiving meals. S.A.C.D.C. Unit 1A and Unit 1B has tables for Inmate to sit outside cells in Unit 1A and Unit 1B to eat meals however S.A.C.D.C. Center employees Refuse to Allow Inmates to use tables that the taxpayers pay for in Unit 1A and Unit 1B to eat these meals where also video-Recording can confirm Receipt of meals / such Actions. * Freedom of Information Act Requires the government of South Carolina to make Available Video-Recording from October 12, 2010 thru November 29th, 2011 to include however not limited all documents of Plaintiff involuntary confinement movements From October 12, 2010 thru November 29th 2011. This is a Request of Plaintiff, of all Records, medical Records, Video-Recordings, Computer Records Notes ectera under the Freedom of Information Act.

Note: The City of North Charleston Police Department exported a tour of Unit 1A at S.A.C.D.C. consisting of kids with view the Plaintiff restrain in restraint chair in the month of August 2011 without Plaintiff consent. Detaining Plaintiff in a "false light." See The Video in Unit 1A. All the captioned Defendants has Detainee Plaintiff in a "false light" from October 12, 2010 (thru November 29th, 2011) thru Release of Plaintiff in January 24th 2012 while suffering placement/conditions/treatment in Unit 1A, Unit 1B, restraint chair numerous times, Plaintiff being taze with tazer gun Plaintiff gas with unknown substance/chemicals, Plaintiff being placed in cells with feces, bacteria, peeling paint, gas chemicals all in-brope on walls, floors and ceilings.

(Continued on Next page)

5 Sept. 27, 2013
PJ 6 of 16

placement in C.C.O.H. medical facility cells to include C.C.O.H. medical cell incubator (for approximately (1) week) by S.A.C.D.C. employees (see U.S.D.C. of South Carolina civil action claim 3:11-w-1489) without any medical diagnose nor medical confirmation of any harmful illness to Plaintiff, Plaintiff surroundings and environment. Note: The Defendants has a history of placing Plaintiff in solitary confinement see U.S.D.C. case for reference: Christopher Odom v. Veronica Smalls et al. Plaintiff refuses to allow Defendants to inject Plaintiff with syringes of unknown substance. The defendant contravenes this history on October 12, 2010 thru November 29th, 2011. Plaintiff was involuntarily and against Plaintiff will (see U.S.D.C. 3:11-cv-2713) placing Plaintiff in South Carolina Department of Mental Health, G. Werner Bryan Psy Hospital, Cratts Farrow State Hospital, G.E.O. Just Care (Doctors Ferland and Dr. Griswald) (see U.S.D.C. of S.C. 3:11-w-901, U.S.D.C. of S.C. 3:11-w-903) and raped and injected drugs in Plaintiff while the defendants of S.C.D.M.H. employees, staff/security held down Plaintiff on September 28th, 2011. These S.C.D.M.H. officials, doctors nurses, security officers and staff continued to threaten, forcefully make Plaintiff induce the drug "HALDO" Plaintiff suffers loss of sleep, nightmares and need of life-time medical treatment from non-affiliated healthcare providers of the Defendants to include however not limited Dr. Russell Keith and Dr. J. Bernice. Plaintiff induce the drug "HALDO" 3 times a day for 60 days with threats and force using security and employees to bully the Plaintiff. Bullying must stop. Raping must stop. Forcefully placing Plaintiff in S.C.D.M.H. facility and the failure of Defendants to serve and protect Plaintiff. The state of South Carolina and all captioned defendants has caused Plaintiff to be mentally poison for life and other medical conditions therefore will be held responsible for judgment against Defendants in the sum of \$16 million dollars. The City of Charleston taxpayers Mayor Riley, the City of Charleston taxpayers Mayor Police Department, the City of North Charleston taxpayers Mayor Nicky, the City of North Charleston police Department, Nicky, Mayor S. Summey, the City of South Carolina taxpayers to include Governor of S.C. and the state of South Carolina Defendants and all captioned, however not limited too all captioned Defendants and all captioned defendants, all captioned Defendants personal injury/grossly negligence insurance policy holders will be held liable/responsible wherefore Plaintiff demands judgment against the defendants in the sum of \$16 million dollars. The captioned Defendants violated Plaintiff personal property, Plaintiff physical being causing Plaintiff emotional distress, injuries while the defendants continue there deliberate malicious mischief on Plaintiff. Plaintiff is traumatized. The foregoing is true and correct. September 11th, 2013


CHRISTOPHER ODOM
PLAINTIFF

DATE: September 11th, 2013

5
Sept 27 2013
pg 7 of 18


FOR U.S.D.C.

V. RELIEF

State briefly and exactly what you want the court to do for you.

See Attachment A thru K /
 I thru XI. And original
 Complaint filed on 10-29-10
 At Family Court 100 Broad
 St. Cape S.C. 29401, Judge
 Paul Graterke.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 23rd day of September, 2013.


Signature of Plaintiff

1-2-13
 Sept. 23, 2013
 pg. 16 of 18